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March 5, 2025

**Via ECF**

The Honorable Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, New York 10007

**Re: AT&T Enterprises, LLC v. Atos IT Solutions and Services, Inc. Case No. 01:23-cv-01395**

Dear Judge Liman:

As counsel to Defendant Atos IT Solutions and Services, Inc. ("Atos"), we write pursuant to Attachment A (Procedure for Sealed or Redacted Filings) of Your Honor's Individual Practices in Civil Cases (the "Sealing Procedures").

Contemporaneous with this letter, Atos filed a motion for sanctions pursuant to Fed. R. Civ. P. 37(e), supported by a declaration of the undersigned (the "Medzhibovsky Declaration"). The declaration attaches documents produced by AT&T and designated as Confidential under the Protective Order. Those documents are Exhibits 6, 9 and 13 to the Medzhibovsky Declaration. Under Section 4(b) of the Sealing Procedures, Atos requests that the Court grant the parties one week to confer about the Confidential exhibits so AT&T may assess whether sealing or redactions may be warranted.

Atos takes no position on whether the exhibits are properly sealed and defers to AT&T to elaborate on the need for sealing or redactions in any letter motion it files under Section 4(b) of the Sealing Procedures.

Respectfully submitted,


**DLA Piper LLP (US)**

*s/ Leon Medzhibovsky*

Leon Medzhibovsky

cc: All Counsel of Record

Atos' letter motion to seal, Dkt. No. 138, is denied.

SO ORDERED.  
  
LEWIS J. LIMAN  
United States District Judge

March 19, 2025